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ILLINOIS COMMERCE COMMISSION

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May 18 10 22 AM '00

COMMONWEALTH EDISON COMPANY)

CHIEF CLERK'S OFFICE

Petition for Approval of a Revised)
Decommissioning Expense Adjustment)
Rider.)

00-0361

**PETITION OF COMMONWEALTH EDISON COMPANY
FOR APPROVAL OF A REVISED DECOMMISSIONING
EXPENSE ADJUSTMENT RIDER TO TAKE EFFECT
UPON TRANSFER OF COMED'S NUCLEAR GENERATING STATIONS**

The Illinois Commerce Commission (the "Commission") has expressed publicly its interest in resolving decommissioning cost recovery. Commonwealth Edison Company ("ComEd"), by its attorneys, is pleased to respond by presenting a comprehensive proposal through a revised Rider 31, (attached to this petition as Exhibit A), which will limit ComEd's recovery of decommissioning costs from customers to a fixed amount over a six year period. At the end of the six years, subject to reconciliation, ComEd customers would have no further responsibility for decommissioning costs.

The revised Rider would take effect at the beginning of ComEd's next billing cycle following the transfer of ComEd's Nuclear Generating Stations (the "Nuclear Stations") to an affiliate generating company (the "Genco"), a wholly owned subsidiary of Exelon, formed in connection with Unicom Corporation's merger with PECO Energy Company. This six year period tracks a Power Purchase Agreement under which the Nuclear Stations will continue to provide electricity to Illinois jurisdictional customers of ComEd.

This petition presents the Commission with a unique opportunity to benefit Illinois and ComEd customers by adopting a rider that will resolve ComEd customers' responsibility for decommissioning costs, thereby providing savings of \$1.0 billion to ComEd retail customers, end customer payments for decommissioning in six years, and transfer the risk of increases in decommissioning costs from ComEd retail customers to the Genco. In support of this petition, ComEd states:

1. ComEd has filed with the Commission its Notice of Transfer of Assets and Wholesale Marketing Business pursuant to Section 16-111(g) of the Illinois Public Utilities Act ("Act"), 220 ILCS 5/16-111(g). In the Notice, ComEd describes its plan to transfer to the Genco all of ComEd's nuclear electric generating assets and other assets at the time of, or shortly after, the closing of the merger of ComEd's parent company Unicom Corporation with PECO Energy Company. As the Commission is aware, on November 23, 1999, the Commission was apprised of the merger in a filing pursuant to Section 16-111(g) of the Act, and the Commission did not take any action to prohibit the merger.

2. In connection with the transfer of the Nuclear Stations, ComEd intends to enter into certain agreements with the Genco, including a Power Purchase Agreement, which provides for ComEd's purchase of power from the Genco, a Contribution Agreement, and an Interconnection Agreement pertaining to the Nuclear Stations.

3. Under the Power Purchase Agreement, ComEd would obtain all of its power supply from the Genco through 2004. In 2005 and 2006, ComEd would obtain all of its power supply from the Genco, up to the available capacity of the Nuclear Stations. ComEd would obtain any additional supply required from market sources in 2005 and 2006, and, subsequent to 2006, would obtain all of its supply from market

sources which is likely to include power purchased from the Genco and the Nuclear Stations since the Stations will be generating electricity in northern Illinois.

4. Under the Power Purchase Agreement, the price of energy provided to ComEd through 2004 is intended to approximate the cost to ComEd of energy produced by the Nuclear Stations were there to be no transfer of assets to the Genco, assuming an aggregate nuclear capacity factor of 85%. Energy prices will be fixed for the first four years and are stated in a schedule to the Power Purchase Agreement. The schedule of energy prices in the Power Purchase Agreement protects ComEd from any increases in energy prices attributable to increases in nuclear station operating costs, additional investments in station improvements, increases in market prices of energy, and deterioration in nuclear plant performance. Energy prices for the years 2005 and 2006 will be set at then prevailing market prices, which will be subject to FERC approval.

5. Under the Contribution Agreement, the assets in the decommissioning trusts will be transferred to the Genco, and the Genco will be responsible for decommissioning the Nuclear Stations and will bear the risk for increases in decommissioning costs and any shortfalls in the decommissioning trusts at the time of decommissioning. ComEd will be responsible, as a matter of contract, for decommissioning costs and is obligated to collect these costs from retail customers and convey these funds to the Genco for inclusion in the decommissioning trusts to pay for decommissioning of the Nuclear Stations. Under the Act, collection of decommissioning charges from customers is authorized when ComEd has "responsibility as a matter of contract for decommissioning costs" (220 ILCS 5/16-114). Accordingly, absent approval of this Petition, ComEd would be entitled to continue to collect decommissioning charges from customers consistent with its contractual obligation for decommissioning costs.

6. Under Illinois law, ComEd customers are responsible for “all reasonable costs and expenses” that are estimated to be necessary to pay the cost to decommission the Nuclear Stations “at the time of decommissioning” (220 ILCS 5/8-508.1(a)(2); 5/8-201.5). The leading firm in the decommissioning field, TLG Services, Inc., has prepared studies of the costs that are estimated to be necessary to decommission the Nuclear Stations. These studies show that the cost to decommission the Nuclear Stations is \$5.6 billion in 2000 dollars. As of December, 1999, assets in the decommissioning trusts for the Nuclear Stations totaled \$2.5 billion, leaving a \$3.1 billion shortfall in the decommissioning trust funds. Absent approval of this Petition, customer payments under Rider 31 and trust fund earnings will make up this shortfall. In prior cases, the Commission has approved recovery of decommissioning costs over a period between now and 2027, which represents the expiration year of the NRC license for the last nuclear station. Cost of service studies introduced in the 1999 Rider 31 case, Docket No. 99-0015, establish that decommissioning funds would need to be recovered from customers each year through 2027 to provide all of the funds needed to decommission the Nuclear Stations.

7. In this Petition, ComEd is proposing to collect \$120.9333 million from customers each year for six years. ComEd’s proposal would end decommissioning collections after six years consistent with the end of the term of the Power Purchase Agreement, subject to reconciliation, thereby reducing decommissioning collections from customers by approximately 55%, which is equal to \$1.0 billion in savings to customers. Collections from customers at the rate of \$120.9333 million a year is generally consistent with the Commission Staff’s position in Docket No. 99-0015. Recovery of decommissioning costs for a six year period is authorized under the Act (220 ILCS 9-201.5(d)).

8. ComEd's proposal would also transfer risks and the uncertainty of increases in decommissioning costs from ComEd and its customers to the Genco. Examples of some of the risks that will be transferred include: changes in Nuclear Regulatory Commission decommissioning requirements; increases in low-level radioactive waste burial costs; and uncertainty over the cost and manner of long term radioactive waste storage. The historical escalation in low level waste burial costs alone has averaged 20.8% per year over the last 25 years. ComEd's Rider 31 filing in Docket No. 99-0015, and its cost of service figure of \$120.9333 million in that docket, at the suggestion of Commission Staff, put a collar on this escalation rate of 10% per year. This transfer of risks is a significant advantage to ComEd customers.

9. In summary, approval of ComEd's proposed revised Rider would provide substantial benefits to ComEd customers including:

- A reduction in decommissioning rate collections, producing savings to customers of \$1.0 billion;
- Certainty of electric rates for decommissioning;
- An end to annual Rider 31 rate litigation;
- Assumption by the Genco of the risks of decommissioning fund undercollection; and
- Assumption by the Genco of responsibility for interim high level radioactive waste management.

In the event the Commission does not approve revised Rider 31, ComEd would continue to file Rider 31 petitions with the Commission each year to recover estimated decommissioning costs as provided for by the Contribution Agreement.

10. During the pendency of this Petition before the Commission, ComEd will move to stay its 1999 and 2000 decommissioning cases (Docket Nos. 99-0115 and 00-0191, respectively). In the event ComEd's Petition is granted, and the merger and

transfer of assets to the Genco take place, ComEd will move to withdraw its petitions filed in both the 1999 and 2000 decommissioning cases.

11. Since the Genco will assume the risks of increases in decommissioning costs and be responsible for any shortfall in the decommissioning trusts at the time of decommissioning, it will have the incentive to decommission the Nuclear Stations in an efficient and cost effective manner. Both the potential of funding shortfall in the decommissioning trusts and excess funding in the trusts after decommissioning will accrue to the Genco.

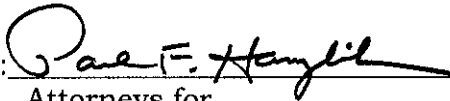
12. ComEd believes that the Commission would like to create certainty with respect to decommissioning funding at the time that it resolves ComEd's Genco filing. To accomplish this, ComEd requests that the Commission enter its Order in this proceeding within 90 days. This would accommodate a closing of the merger and Genco transactions by the end of the third quarter.

13. ComEd also requests that, in accordance with the requirements of Section 468A of the Internal Revenue Code and applicable regulations, the Commission find and adopt the assumptions and other factors used to determine decommissioning costs set forth in Attachment B to this Petition.

WHEREFORE, ComEd requests that the Commission enter an order approving the proposed revision of Rider 31 and providing that the rider become effective with the first day of the first billing cycle month after the transfer of assets to the Genco. The Commission's order would also provide that ComEd file the revised Rider 31 on the first day of the first billing cycle month after the transfer of the assets, to be effective upon filing.

Dated at Chicago, Illinois, this 17~~th~~ day of May, 2000.

Respectfully submitted,

By: 
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STATE OF ILLINOIS)
)SS.
COUNTY OF COOK)

VERIFICATION

I, Robert E. Berdelle, Vice President and Comptroller of Commonwealth Edison Company and a duly authorized agent for Commonwealth Edison Company, verify that I have read the foregoing Petition of Commonwealth Edison Company for Approval of a Revised Decommissioning Expense Adjustment Rider to Take Effect only Upon Transfer of ComEd's Nuclear Generating Stations, that I am familiar with the facts contained therein, and that the same are true and correct to the best of my knowledge and belief.

Robert E. Berdelle
Robert E. Berdelle

SUBSCRIBED and SWORN to
Before me this 16 day of
May, 2000

Mamie Takagi

My commission expires 6/6/2000



RIDER 31
DECOMMISSIONING EXPENSE ADJUSTMENT CLAUSE

This rider is applicable to each and every kilowatt-hour (kWh) of electricity delivered or sold at retail in the Company's service area, including, but not limited to, sales by the Company to tariffed services retail customers, sales by the Company to retail customers pursuant to special contracts or other negotiated arrangements, sales by alternative retail electric suppliers, and sales by an electric utility other than the Company, provided, however, that for a retail customer that obtained electric power and energy from its own generation facilities on or before January 1, 1997, and subsequently takes services from an alternative retail electric supplier or an electric utility other than the Company for any portion of its electric power and energy requirements formerly obtained from those facilities, this rider shall not be applicable in any year to that portion of the retail customer's electric power and energy requirements formerly obtained from those facilities, provided that such portion shall not exceed the average number of kilowatt-hours per year obtained from the generation facilities during the three years prior to the date on which the retail customer became eligible for delivery services.

- * Costs passed through the Decommissioning Expense Adjustment Clause represent estimates of costs to be incurred. The costs used in calculating the Decommissioning Expense Adjustment per kWh (DE) are the total of allowable Decommissioning Expense costs as identified herein.
- * The Company will determine the annual Decommissioning Expense Adjustment (DE), according to the formula below for application in the seventy-two (72) billing cycle months beginning on the first day of the billing cycle month following the effectuation of the merger between Unicom and PECO Energy and the effectuation of the Unicom - "Exelon Genco" contribution agreement pursuant to the Commission's Order in Docket No. XX-XXXX. Such date will be designated herein as the "Start Date." The last day of the 72nd billing cycle month following the Start Date will be designated herein as the "End Date."
- * The charges for all kWhs of energy supplied or delivered to designated customers shall be adjusted by a Decommissioning Expense Adjustment determined as follows:

$$DE = \frac{(AP + RA) \times 100}{S}$$

S

where:

DE = Decommissioning Expense Adjustment per kWh: The amount in cents per kWh, rounded to the nearest .001¢, to be applied to each kWh in the designated billing cycle months.

(Continued on Sheet No. 95.09.5)

RIDER 31
DECOMMISSIONING EXPENSE ADJUSTMENT CLAUSE

(Continued from Sheet No. 95.09.4)

- * **AP** = Annual ICC jurisdictional cost of service funding requirement for decommissioning Company nuclear units equal to **\$120,933,300**.
- * **S** = Total kWhs estimated to be billed subject to the provisions of this rider to designated customers during the applicable twelve-month period.
- * **RA** = Difference between the approved ICC jurisdictional cost of service funding requirement pursuant to this rider and actual recoveries through this rider from the Start Date through the current Determination Period. This amount shall be a credit or charge depending on whether there has been an over- or underrecovery.
- * The Company shall make an annual filing with the Commission for informational purposes at least five (5) business days prior to implementing the Decommissioning Expense Adjustment for the next Applicable Period. Such filing shall provide the calculation and work papers for the Decommissioning Expense Adjustment pursuant to the formulae set forth herein, to be applied to the bills of those customers subject to the provisions of this rider during the next Applicable Period.
- * The Company will reconcile the amounts collected in the 72 billing cycle months during the six (6) billing cycle months following the End Date. The Decommissioning Expense Adjustment will be applied only for purposes of back billing or bill adjustments in the 1st, 2nd, and 3rd billing cycle months following the End Date. In the 4th and 5th billing cycle months following the End Date, the Decommissioning Expense Adjustment shall not be applied and the amount over- or underrecovered in the 72 billing cycle months shall be determined. This over-underrecovery amount shall include any back billing or adjustments processed in the 1st, 2nd, and 3rd billing cycle months following the End Date. This over- or underrecovery amount shall be used to determine the Decommissioning Expense Adjustment that will be applied only in the 6th billing cycle month following the End Date, as follows:

$$DE = \frac{RA \times 100}{S_R}$$

where

- * **S_R** = Total kWhs estimated to be billed subject to the provisions of this rider to designated customers during the 6th billing cycle month following the End Date.

(Continued on Sheet No. 95.09.51)

**RIDER 31
DECOMMISSIONING EXPENSE ADJUSTMENT CLAUSE**

(Continued from Sheet No. 95.09.5)

- * The Decommissioning Expense Adjustment set forth in this tariff shall expire and shall not be applied for purposes of back billing or adjustments or any purposes whatsoever as of the end of such 6th billing cycle month following the end of the End Date.
- * Except in the case of the Decommissioning Expense Adjustment that will be applied in the 6th billing cycle month following the End Date, the Applicable Period shall be the period beginning with the first day of the billing cycle month following the Company's most recent annual filing hereunder (or, in the case of the first Applicable Period, the Start Date) and ending with the last day of the billing cycle month in which the Company expects to make the next filing hereunder. In the case of the 6th billing cycle month following the End Date, the Applicable Period is only such billing cycle month.
- * Except in the case of the reconciliation of the Decommissioning Expense Adjustment that will be determined for application in the 6th billing cycle month following the End Date, the current Determination Period is the period from the Start Date through the last day of the billing cycle month that is three billing cycle months prior to the start of the next Applicable Period. In the case of the reconciliation of the Decommissioning Expense Adjustment that will be determined for application in the 6th billing cycle month following the End Date, the current Determination Period shall be the period beginning with the Start Date and ending with the last day of the 3rd billing cycle month following the End Date.

ComEd Decommissioning Funding - Special Decommissioning Rider

	<u>Cost of Service</u>			<u>Amortization of Prior Collections Nontax-Qualified</u>	<u>Total Contribution Amount</u>
	<u>Tax-Qualified (\$000s)</u>	<u>Nontax-Qualified (\$000s)</u>	<u>Total (\$000s)</u>	<u>(\$000s)</u>	<u>(\$000s)</u>
Dresden 1	0.0	28,179.0	28,179.0	1,396.7	29,575.7
Dresden 2	3,300.8	7,561.5	10,862.3	1,233.5	12,095.8
Dresden 3	4,423.2	9,541.4	13,964.6	1,406.3	15,370.9
Quad Cities 1	0.0	1,219.2	1,219.2	1,083.5	2,302.8
Quad Cities 2	3,258.0	4,766.6	8,024.7	1,093.1	9,117.8
Zion 1	8,364.5	7,072.1	15,436.6	1,352.6	16,789.2
Zion 2	15,189.7	10,702.8	25,892.5	1,340.9	27,233.3
LaSalle 1	0.0	0.0	0.0	920.2	920.2
LaSalle 2	4,839.5	0.0	4,839.5	663.7	5,503.2
Byron 1	0.0	0.0	0.0	9.9	9.9
Byron 2	5,550.2	0.0	5,550.2	396.3	5,946.5
Braidwood 1	0.0	0.0	0.0	64.1	64.1
Braidwood 2	7,328.7	0.0	7,328.7	0.0	7,328.7
Totals	52,254.6	69,042.6	121,297.2	10,960.8	132,258.0

ComEd Decommissioning Funding - Special Decommissioning RiderAssumptions

1. Decommissioning estimates are based on projections prepared by the TLG Services, Inc. consulting firm. The estimates include contingency costs, SAFSTOR costs (for Dresden Unit 1 and Zion Units 1 & 2) and costs for non-radiological material removal. The estimates, expressed in 2000 and future dollars are listed below.

<u>Unit</u>	<u>Estimate</u> <u>(\$ Millions)</u> <u>(2000 \$)</u>	<u>Estimate</u> <u>(\$ Millions)</u> <u>(Future \$)</u>
Dresden 1	359.6	574.3
Dresden 2	446.2	569.1
Dresden 3	508.7	781.3
Quad Cities 1	301.7*	460.7*
Quad Cities 2	368.4*	589.5*
Zion 1	450.8	780.2
Zion 2	579.3	965.8
LaSalle 1	471.3	1,134.6
LaSalle 2	559.6	1,368.2
Byron 1	322.0	829.5
Byron 2	462.0	1,272.7
Braidwood 1	323.3	903.8
Braidwood 2	496.1	1,420.2

* ComEd Portion (75%)

2. Expenditures from the decommissioning trusts generally are assumed to be expended the year following the date specified in the TLG studies. Preparatory costs normally begin on or before the retirement year of the unit's operation. Substantial decommissioning expenditures begin shortly after license expiration. The retirement year is based on each unit's NRC license expiration. However, the retirement year assumed for Dresden 1 coincides with the retirement year for Dresden 3. Zion 1 and 2 assumed retirement years are based on the original operating license life termination.

3. The decommissioning costs (2000 \$) are escalated at an annual rate of 4.11% from 1999 until the year that the costs are incurred in order to project the 1999 estimated costs to the future.

4. It is assumed that the non-tax-qualified fund would normally be fully expended before withdrawing from the tax-qualified fund to meet decommissioning obligations.

ComEd Decommissioning Funding - Special Decommissioning Rider Assumptions

5. Non-tax-qualified contributions are deposited on or before December 31 each year while tax-qualified contributions are deposited no later than March 15 of the following year.

6. The projected returns, asset allocations, tax-rates and calculated earnings-rates for the tax-qualified and non-tax-qualified funds prior to decommissioning are provided below.

	<u>S&P 500</u>	<u>U.S. Govt. Bonds</u>	<u>Mortgage Backed Securities</u>	<u>Corp Bonds</u>	<u>Tax-Exempt Bonds</u>	<u>Total</u>
<u>Non-Tax-Qualified</u>						
Tax Rate	35%	35%	35%	35%	N/A	
After-Tax Return	8.0%	4.6%	5.3%	5.1%	5.7%	
Allocation	58%	0%	0%	0%	42%	
Overall After-Tax After Fees Earnings Rate						6.83%

<u>Tax-Qualified</u>						
Tax Rate	20%	20%	20%	20%	N/A	
After-Tax Return	8.8%	5.7%	6.5%	6.2%	5.7%	
Allocation	60%	20%	10%	10%	0%	
Overall After-Tax After Fees Earnings Rate						7.49%

N/A = Not Applicable

7. The projected returns, asset allocations, tax-rates and calculated earnings-rates for the tax-qualified and non-tax-qualified funds, during the dismantlement periods, are provided below.

<u>Long Term Annual Returns</u>	<u>S&P 500</u>	<u>Taxable Bonds</u>	<u>Cash</u>	<u>Non-Taxable Bonds</u>
Inflation	4.5	4.5	4.5	4.5
Premium Over Inflation	<u>6.5</u>	<u>3.2</u>	<u>1.0</u>	<u>1.2</u>
Nominal Return	11.0	7.7	5.5	5.7

ComEd Decommissioning Funding - Special Decommissioning Rider
Assumptions

7. (continued)

Average asset allocation during dismantlement period

Equities	20%
Bonds	35%
Cash	45%

Tax-Qualified tax rate	20%
Non-Qualified tax rate	35%

Decommissioning Trust estimated returns during dismantlement period

Before-Tax Returns

Qualified Trust	7.4%
Non-Qualified Trust	6.7%

After-Tax Returns

Qualified Trust	5.9%
Non-Qualified Trust	5.2%

8. As part of the restructuring of ComEd, including the transfer by ComEd to a newly-formed or successor generating company ("Genco") of the nuclear generating assets of ComEd, Genco will assume primary responsibility for the ultimate decommissioning of such assets. ComEd will also transfer to Genco the Nuclear Regulatory Commission licenses to operate the power generation plants, as well as the assets, including investments, in the nuclear decommissioning trust funds, both tax-qualified and nontax-qualified relating to such plants, and the right to future decommissioning collections. ComEd will enter into a six-year collection agency agreement with Genco pursuant to which ComEd will collect decommissioning amounts from its ratepayers on behalf of Genco. ComEd will pay such collected amounts to Genco as the owner of the right to such collections. ComEd will be compensated for performing such collection service. The collection agency agreement can not be terminated before the collection of all of the decommissioning amounts.

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

COMMONWEALTH EDISON COMPANY :

No. 00-_____

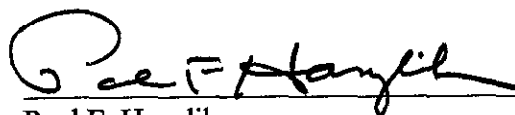
Petition for Approval of a Revision to
Decommissioning Expense Adjustment Rider to
Take Effect on Transfer of ComEd's Generating
Stations :

NOTICE OF FILING

TO: Attached List

PLEASE TAKE NOTICE that on this date we have filed with the Chief Clerk of the Illinois Commerce Commission, 527 East Capitol Avenue, Springfield, Illinois 62701, Petition of Commonwealth Edison Company for Approval of a Revision to Its Decommissioning Expense Adjustment Rider to Take Effect on Transfer of ComEd's Generating Stations.

DATED: May 17, 2000

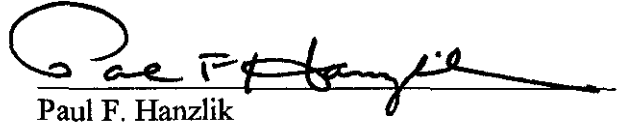


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CERTIFICATE OF SERVICE

I, Paul F. Hanzlik, do hereby certify that a copy of Petition of Commonwealth Edison Company for Approval of a Revision to Its Decommissioning Expense Adjustment Rider to Take Effect on Transfer of ComEd's Generating Stations was served upon all parties on the attached list by Federal Express, on May 17, 2000.



Paul F. Hanzlik

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